ORIGINAL

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)	GC Docket No. 92-52
)	
Reexamination of the Policy)	DEACH/ED
Statement on Comparative)	RECEIVED
Broadcast Hearings)	

To: The Commission

TJUE 2 5 1994

MOTION TO LEAVE TO FILE FEDERAL COMMUNICATIONS COMMISSIONS COMMENTS OF BECHTEL & COLE, CHARTERED OF THE SECRETARY

We are submitting comments in response to the Commission's second further notice of proposed rulemaking on this Monday, July 25th, whereas they were due on Friday, July 22nd. I am the attorney here having the responsibility for preparing the comments, which are a distillation of nearly ten years of litigating the matters involved in the comments. The first of last week, I returned to the office from a two week absence to a large volume of work and also some personal family matters which required immediate attention. As a result, I simply ran out of town to get everything done last week and the preparation of these comments was a casualty of the overload.

In this morning's mail, I received copies of two comments that were filed on Friday and served on me. To be fair, I have not read either of those comments pending completion and filing of our own comments. Accordingly, I have not taken advantage of the delay vis-a-vis those commenting parties. Acceptance of our comments one business day late should not materially delay the ultimate resolution of the proceeding, unduly disrupt the Commission's processes or cause harm to any party.

No. of Copies rec'd C+/U List A B C D E For these reasons, good cause exists to accept our comments, and we move the Commission to do so.

Respectfully submitted,

Gene A. Bechtel

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July 25, 1994

CERTIFICATE OF SERVICE

I, Gene A. Bechtel, certify that copies of the foregoing MOTION FOR LEAVE TO FILE COMMENTS OF BECHTEL & COLE, CHARTERED, 25th day of July 1994 being duly served on the following persons either by hand delivery to their office as noted or by mailing in the United States mail, first class, with postage prepaid:

Service by hand delivery:

The Hon. Edward Luton Suite 225 2000 L Street, N.W. Washington, D.C. 20554

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Gene A Bechtel

CERTIFICATE OF SERVICE

I certify that on this 25th day of July 1994 I am causing copies of the foregoing MOTION FOR LEAVE TO FILE COMMENTS OF BECHTEL & COLE, CHARTERED, to be served by personal delivery or by first class United States mail, postage prepaid, addressed to the following:

Via Hand Delivery

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Gene A. Bechtel

Certificate of Service

I, Gene A. Bechtel, certify that I am causing copies of the foregoing MOTION FOR LEAVE TO FILE COMMENTS OF BECHTEL & COLE, CHARTERED, to be served this 25th day of July 1994 on the following individuals:

Via Hand Delivery

The Honorable Joseph A. Marino Chairman, Review Board Federal Communications Commission 2000 L Street, N.W. -- Suite 211 Washington, D.C. 20554

The Honorable Marjorie R. Greene Member, Review Board 2000 L Street, N.W. -- Suite 204 Washington, D.C. 20554

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Gene A. Bechtel

CERTIFICATE OF SERVICE

I certify that true copies of the foregoing MOTION FOR LEAVE TO FILE COMMENTS OF BECHTEL & COLE, CHARTERED, have been served this 25th day of July 1994 by hand delivery or United States mail, first class, postage prepaid, to the offices of the following individuals:

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* Denotes hand delivery

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